

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LUCIA LOPEZ CATZIN and SILVIA  
VILLANO CLEMENTE, individually and on  
behalf of others similarly situated,

Plaintiffs,

-against-

THANK YOU & GOOD LUCK CORP.,  
ZENG LAN WANG, OFFBROADWAY  
LAUNDROMAT INC., 2167 3RD AVE  
LAUNDROMAT LLC and IGOR BIRZH,

Defendants.

Case No.: 15-cv-7109(KBF)

**PLAINTIFFS' RULE 26(a) DISCLOSURES**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiffs Lucia Lopez Catzin and Silvia Villano Clemente make the following Initial Disclosures.

**I. Persons Believed To Have Discoverable Information That Plaintiffs May Use to Support Their Claims.**

1. Plaintiff Lopez Catzin. Plaintiff Lopez Catzin may be reached through the undersigned counsel.

Plaintiff Lopez Catzin has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Plaintiff Lopez Catzin has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Plaintiff Lopez Catzin was working for Defendants. Plaintiff Lopez Catzin also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Plaintiff Lopez Catzin has knowledge regarding the lack of merit to Defendants' answers and defenses asserted in Defendants' Answers. Finally, Plaintiff Lopez Catzin has knowledge regarding Bubble Defendants' successor liability.

2. Plaintiff Villano Clemente. Plaintiff Villano Clemente may be reached through the undersigned counsel.

Plaintiff Villano Clemente has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Plaintiff Villano Clemente has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Plaintiff Villano Clemente was working for Defendants. Plaintiff Villano Clemente also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Plaintiff Villano Clemente has knowledge regarding the lack of merit to Defendants' answers and defenses asserted in Defendants' Answers. Finally, Plaintiff Villano Clemente has knowledge regarding Bubble Defendants' successor liability.

3. Defendant Zeng Lan Wang. Defendants have access to Defendant Wang's contact information.

Defendant Wang has knowledge concerning Plaintiffs' and Defendants' other employees' positions, dates of employment, job duties, weekly schedule, and how they were paid while working for Thank You Defendants. Defendant Wang also has knowledge of Thank You Defendants' relevant personnel policies and procedures. Defendant Wang also has knowledge of Thank You Defendants' unlawful conduct as set forth in the Complaint. Defendant Wang also has knowledge regarding the Bubble Defendants' successor liability.

4. Defendant Igor Birzh. Defendants have access to Defendant Birzh's contact information.

Defendant Birzh has knowledge concerning Plaintiffs' and Bubble Defendants' other employees' positions, dates of employment, job duties, weekly schedule, and how they were paid while working for Bubble Defendants. Defendant Birzh also has knowledge of

Bubble Defendants' relevant personnel policies and procedures. Defendant Birzh also has knowledge of Bubble Defendants' unlawful conduct as set forth in the Complaint. Defendant Birzh also has knowledge regarding the Bubble Defendants' successor liability.

5. Dimitri [LNU]. Defendants have access to Dimitri's contact information.

Dimitri has knowledge concerning Plaintiffs' and Bubble Defendants' other employees' positions, dates of employment, job duties, weekly schedule, and how they were paid while working for Bubble Defendants. Dimitri also has knowledge of Bubble Defendants' relevant personnel policies and procedures. Dimitri also has knowledge of Bubble Defendants' unlawful conduct as set forth in the Complaint. Dimitri also has knowledge regarding the Bubble Defendants' successor liability.

6. Grant [LNU]. Defendants have access to Grant's contact information.

Grant has knowledge concerning Plaintiffs' and Bubble Defendants' other employees' positions, dates of employment, job duties, weekly schedule, and how they were paid while working for Bubble Defendants. Grant also has knowledge of Bubble Defendants' relevant personnel policies and procedures. Grant also has knowledge of Bubble Defendants' unlawful conduct as set forth in the Complaint.

7. Delva Uvera. Ms. Uvera can be reached at 917-201-9943.

Ms. Uvera has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Ms. Uvera has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Ms. Uvera was working for Defendants. Ms. Uvera also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Ms. Uvera has knowledge regarding the lack of merit to Defendants' answers and defenses asserted

in Defendants' Answers. Finally, Ms. Uvera has knowledge regarding Bubble Defendants' successor liability.

8. Fabiola [LNU]. Fabiola can be reached at 718-708-9782.

Fabiola has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Fabiola has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Fabiola was working for Defendants. Fabiola also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Fabiola has knowledge regarding the lack of merit to Defendants' answers and defenses asserted in Defendants' Answers.

9. Sharlyn [LNU]. Sharlyn can be reached at 347-869-0347

Sharlyn has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Sharlyn has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Sharlyn was working for Defendants. Sharlyn also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Sharlyn has knowledge regarding the lack of merit to Defendants' answers and defenses asserted in Defendants' Answers.

10. Mayra [LNU]. Mayra can be reached at 347-869-0347

Mayra has knowledge regarding her position, dates of employment, job duties, weekly schedule, and how she was paid while working for Defendants. Furthermore, Mayra has knowledge regarding the schedules and job duties of Defendants' other employees as well as how they were paid while Mayra was working for Defendants. Mayra also has knowledge of Defendants' unlawful conduct as set forth in the Complaint. In addition, Mayra has knowledge

regarding the lack of merit to Defendants' answers and defenses asserted in Defendants' Answers.

11. Other current and former employees. Upon information and belief, several current and/or former employees of Defendants are familiar with Defendants' unlawful payroll practices. These individuals' names and addresses are known to Defendants.

**II. Documents In Plaintiffs' Possession Which Plaintiffs May Use To Support Their Claims In This Case.**

1. Pay records.

**III. Compensation of Any Category of Damages Claimed by Plaintiffs.**

Plaintiffs seek the following damages:

- A. Compensatory Damages in an amount to be determined at trial;
- B. Damages for emotional distress;
- C. Prejudgment Interest;
- D. Liquidated Damages pursuant to the FLSA and NYLL;
- E. Plaintiffs' costs and reasonable attorneys' fees; and
- F. Any relief the Court deems just and proper.

A calculation of damages, not including prejudgment interest, is attached hereto as **Exhibit 1**.

**IV. Insurance.**

Not applicable.

**V. Amendments.**

Plaintiffs reserve the right to seasonably supplement, amend, or modify their Rule 26(a) Initial Disclosures.

Respectfully submitted,

SERRINS FISHER LLP  
233 Broadway, Suite 2340  
New York, New York 10279  
(212) 571-0700

Dated: December 14, 2015  
New York, New York

By:   
Michael Taubenfeld  
*ATTORNEYS FOR PLAINTIFFS*

**Total**

Plaintiff	Amount of Bridge Damages	Interest Damages	Attorneys' Fees	Total Damages
Lopez Catzin	\$51,464.73	\$14,885.89		\$66,350.62
Villano Clemente	\$108,652.73	\$19,674.50		\$128,327.23
				\$194,677.85



Silvia Villano Clemente						
Thank You and Bubble Defendants Damages						
Dates	Regular Hours Per Week	Overtime Hours Per Weeks	Amount Paid Per Week	Overtime Rate	Overtime Damages Per Week	Spread-of-Hours Damages Per Week
7/21/2011- 9/28/2012	40	17	\$300.00	\$7.50	\$11.25	\$191.25
9/28/2011- 12/31/2013	40	17	\$350.00	\$8.75	\$13.13	\$223.13
1/1/2014- 12/8/2014	40	21	\$430.00	\$10.75	\$16.13	\$338.63

Bubble Defendants Damages						
Dates	Regular Hours Per Week	Overtime Hours Per Weeks	Minimum Wage Damages Per Week	Overtime Damages Per Week	Spread-of-Hours Damages Per Week	FSLA Liquidated Damages Per Week
1/26/2014- 12/30/2014	40.00	14	\$8.00	\$8.50	\$4.25	\$48.00
1/27/2014- 1/1/2015	40.00	14	\$8.75	\$8.50	\$4.63	\$100.00

\$19,652.73

Dates	Regular Hours Per Week	Overtime Hours Per Weeks	Minimum Wage Damages Per Week	Overtime Damages Per Week	Spread-of-Hours Damages Per Week	FSLA Liquidated Damages Per Week	Total Damages	NYLL 195 Claims	Total
1/26/2014- 12/30/2014	40.00	14	\$8.00	\$8.50	\$4.25	\$48.00	\$107.50	\$59.50	\$107.50
1/27/2014- 1/1/2015	40.00	14	\$8.75	\$8.50	\$4.63	\$100.00	\$117.25	\$64.75	\$117.25

\$18,851.00

\$55,000.00

\$19,574.50

\$19,574.50